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7 SAFECO INSURANCE COMPANY OF AMERICA

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 EDWARD STOLZ, an individual,
11 Plaintiff,

12 vs.

13 SAFECO INSURANCE COMPANY OF
AMERICA, a New Hampshire corporation;
14 DOES I through X, ROE CORPORATIONS
15 XI through XX,
16 Defendants

CASE NO.: 2:14-cv-02060-RFB-NJK

STIPULATION AND ORDER TO
EXTEND TIME FOR PARTIES TO FILE
REPLIES TO MOTIONS FOR
SUMMARY JUDGMENT

[SECOND REQUEST]

17 COME NOW, Defendant, SAFECO INSURANCE COMPANY OF AMERICA
18 [hereinafter "Safeco"], by and through its counsel of record, the law firm of KOELLER,
19 NEBEKER, CARLSON & HALUCK, LLP, and Plaintiff, EDWARD STOLZ, by and through
20 his attorney of record, Matthew M. Pruitt, Esq., of the law firm of ALVERSON, TAYLOR,
21 MORTENSEN & SANDERS, and hereby stipulate to extend the time for each to file their
22 Replies to one another's respective Motions for Summary Judgment filed in the above-entitled
23 matter.

24 Each party filed their own Motion for Summary Judgment on January 8, 2016.
25 Oppositions to the respective Motions were filed by the parties on February 16, 2016. (See,
26 Court Documents Nos. 42, 43, 46 and 47, on-file herein). On March 1, 2016, this Court
27 granted the parties' Stipulation to extend time to file Replies to the respective Motions to
28 allow for potential informal settlement negotiations and mediation and/or a settlement
conference. (Se, Court Document No. 49, on-file, herein).

1 The parties have diligently worked towards scheduling mediation in this matter.
2 However, unexpected scheduling concerns have made scheduling mediation more difficult
3 than anticipated. The parties are currently attempting to schedule mediation during the last
4 three (3) weeks of May 2016. As such, the parties have agreed to seek an additional extension
5 of time to file their Replies, as indicated herein.

6 The parties' Replies are currently due by or before May 3, 2016. As such, the parties
7 hereby request an Order from this Court memorializing that Replies to each party's Motion for
8 Summary Judgment are now due by or before **Friday, July 1, 2016**.

9
10 DATED this 12th day of April, 2016.

DATED this 12th day of April, 2016.

11 ALVERSON, TAYLOR, MORTENSEN
12 & SANDERS

KOELLER, NEBEKER, CARLSON
& HALUCK, LLP

13 By /s/ Matthew M. Pruitt
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SAFECO INSURANCE COMPANY OF
AMERICA

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ORDER

IT IS HEREBY ORDERED that the time for each party to file its Reply in support of the presently pending Motions for Summary Judgment (Court Documents Nos. 42, 43, 46 and 47, on-file herein) is extended until **Friday, July 1, 2016**. The parties will also submit a joint status report to this Court regarding any pending motions by **July 8, 2016**.



RICHARD F. BOULWARE, II
United States District Judge
DATED: April 26, 2016.

Respectfully submitted by,

KOELLER, NEBEKER, CARLSON
& HALUCK, LLP

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